

FILED  
AUG 10 2019  
David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA

Vs.

Eduardo Casares

Christina Vasquez

Jose Alfredo Aleman-Martinez

CRIMINAL COMPLAINT

Case Number: 2:19-MJ-3115

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about August 9, 2019 in Brooks County, in the

(Date)

Southern District of Texas, defendant,

**Eduardo Casares**

**Christina Vasquez**

**Jose Alfredo Aleman-Martinez**

each aiding, abetting and assisting one another, did knowingly or in a reckless disregard of the fact that an alien had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law

in violation of Title 8 United States Code, Section(s) 1324

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the

Official Title

following facts:

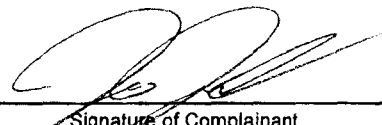
See Attached Affidavit of U.S. Border Patrol Agent

**James Jewell**

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on the:

  
Signature of Complainant  
**James Jewell**  
Printed Name of Complainant

August 10, 2019

Date

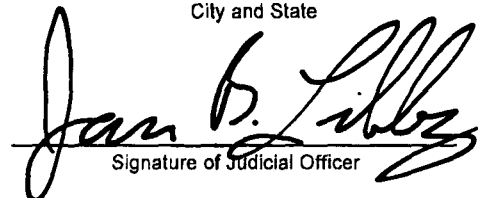
at

Corpus Christi, Texas

City and State

**Jason B. Libby U.S. Magistrate Judge**

Name and Title of Judicial Officer

  
Signature of Judicial Officer

### AFFIDAVIT

The information contained in this report/affidavit is based upon my personal participation in the investigation, which included, but is not limited to information relayed to me by other agents and officers participating in the investigation.

#### FACTS/DETAILS:

On August 9, 2019, at approximately 3:15 a.m., a silver Chevrolet Traverse approached the primary inspection lane of the Falfurrias checkpoint for an immigration inspection of its occupants. As the vehicle approached the location of the primary agent, he could see three occupants in the vehicle. There was an adult male in the driver seat and an adult female in the back passenger seat sitting with a child in a car seat. The primary agent asked the driver, later identified as Eduardo CASARES, where he was going, to which CASARES answered Austin, Texas. The primary agent then asked the purpose for them going to Austin and CASARES replied they were going to visit family. When the primary agent asked how long they were going to be in Austin, CASARES said they were going to spend the whole weekend.

The primary agent then asked CASARES how he and the female passenger, later identified as Christina Vasquez, were related and CASARES stated that they were a couple. The primary agent then asked CASARES and Vasquez if the child belonged to them and they replied yes. The agent asked if they had the birth certificate of the child and both passengers replied that they did not. The primary agent then requested permission to open the rear hatch of the vehicle which was granted by CASARES. At that time, the primary agent saw that there was not much luggage for their travelling arrangements. The primary agent went back to CASARES and asked both passengers if they had any identification. CASARES handed the agent a Texas identification card and VASQUEZ handed the agent a North Carolina Driver's License. The primary agent then asked CASARES for consent to conduct a non-intrusive x-ray inspection of the vehicle which was granted by CASARES. The primary agent notified Border Patrol Agents in the secondary inspection area not to release the vehicle as he wanted to conduct a further immigration inspection.

The vehicle was mistakenly released from secondary inspection after being x-rayed. After being relieved from primary inspection duties, the primary agent left the checkpoint to retrieve the vehicle. The primary agent found the vehicle in the northbound lane of the Brooks County Rest Area. The primary agent approached the vehicle and saw CASARES sleeping in the front passenger seat. The primary agent knocked on the window and when CASARES rolled it down he informed him that he was mistakenly released from the checkpoint without the inspection being completed. At that time the primary agent asked CASARES if he could follow him back to the checkpoint to which CASARES said yes.

Once back at the checkpoint both CASARES and VASQUEZ were asked as to their relationship to the child. At that time they claimed that the child was their niece and they were going to drop her off with her family. The primary agent asked again if they had a birth certificate and VASQUEZ said she left it at their house. VASQUEZ then freely admitted that she did not know the child and that she was going to drop her off in Houston, Texas. At that time, both VASQUEZ and CASARES were

detained and read their Miranda Rights in order to determine if the child was kidnapped or an alien being smuggled. Both subjects agreed to make a statement without a lawyer present. During VASQUEZ's statement it was determined the child was an illegal alien.

**NOTE:**

Border Patrol Agents found a Mexican passport in the vehicle belonging to Jose Alfredo ALEMAN-Martinez. A group of eight subjects was apprehended approximately one mile north of the Falfurrias checkpoint at approximately 4 a.m. During VASQUEZ's later interview, she admitted to dropping off the group of eight in order to circumvent the checkpoint. VASQUEZ also identified ALEMAN as the guide who would lead the aliens through the brush past the checkpoint. ALEMAN was apprehended amongst the group. Also apprehended in the group was a Mexican female, later identified as Patricia REYES-Rios, who freely claimed that her child had been in the car that transported her north when she was dropped off along the highway. Agents confirmed that the child apprehended at the checkpoint was the child of REYES. All of the aliens apprehended in the brush stated that they did not wish to make a statement without a lawyer present.

**PRINCIPAL STATEMENT (Eduardo CASARES):**

CASARES stated he and his girlfriend VASQUEZ made arrangements with a friend called "Alfredo", later identified as Jose Alfredo ALEMAN-Martinez, to drop off a group of illegal aliens to circumvent the immigration checkpoint and to smuggle a baby girl through the checkpoint. CASARES stated after renting a vehicle at the Harlingen airport he called ALEMAN and was told to go to the Dolphin Hotel in Donna, Texas. CASARES stated that once he and VASQUEZ arrived at the hotel, ALEMAN and approximately six other people got into the vehicle. CASARES was then instructed by ALEMAN to drive towards the Falfurrias checkpoint. CASARES stated that ALEMAN told him to stop at a crossover when they were near the checkpoint. Upon doing so, CASARES stated that all of the aliens exited the vehicle and entered the brush to circumvent the checkpoint. CASARES said that ALEMAN told him to wait at the rest area north of the checkpoint and wait for him to pick the group up. CASARES stated that he then drove back to the hotel and picked up VASQUEZ and the child and returned towards the checkpoint. CASARES also stated after signing a consent form to search his phone that he had ALEMAN's phone number and several calls in the call logs. CASARES was shown a photo line-up and was able to positively identify "Alfredo" as ALEMAN.

CASARES stated that ALEMAN was going to pay him \$4,000 for his part in smuggling the aliens through the checkpoint. CASARES claimed he would drop two of the aliens off in Houston and the rest in Ohio. CASARES also claimed he had rented the vehicle because he needed a larger automobile to transport all of the aliens.

**PRINCIPAL STATEMENT (Christina VASQUEZ):**

VASQUEZ stated that about two days ago, her boyfriend CASARES was contacted by an acquaintance named "Alfredo" (later identified as ALEMAN) to drop off a group of illegal aliens to circumvent the Falfurrias checkpoint. VASQUEZ also stated that they were to smuggle an illegal alien child through the checkpoint. VASQUEZ stated that on August 8, 2019, at approximately 10

p.m., ALEMAN made arrangements for VASQUEZ and CASARES to pick up a group of aliens at the Dolphin Motel. VASQUEZ stated she rented a vehicle in Harlingen, Texas and drove it to the motel arriving at approximately midnight. VASQUEZ stated the aliens entered the vehicle one by one including a baby and her mother and father.

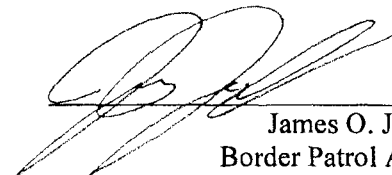
VASQUEZ initially stated both her and CASARES would be paid \$1,000, although she later admitted to payments of \$560 per person. When asked if she had smuggled before, VASQUEZ denied ever doing it, but later admitted to having been apprehended for alien smuggling in the past at the Falfurrias checkpoint. VASQUEZ also confessed to having come up with the false narrative that the child was her niece and that they were travelling to Austin, Texas.

When asked if she could describe ALEMAN, VASQUEZ stated that he was approximately 35 years old, with a medium skin tone, and average build. VASQUEZ stated that ALEMAN not only offered her the smuggling attempt, but that he was the person guiding the group through the brush. VASQUEZ also stated that ALEMAN told her to stop and drop off the group and to wait for them once they walked around the checkpoint. VASQUEZ was to wait for a phone call telling her where to pick them up.

Border Patrol Agents had found a Mexican passport in the center console and VASQUEZ said that it may belong to ALEMAN. Once shown the passport photo, VASQUEZ was able to identify "Alfredo" as ALEMAN.

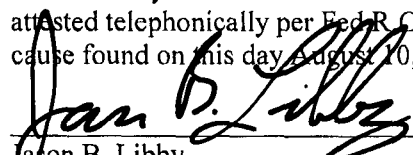
**DISPOSITION:**

The facts of this case were presented to Assistant United States Attorney Reid Manning who accepted Eduardo CASARES, Christina VASQUEZ, and Jose Alfredo ALEMAN-Martinez for prosecution of 8 USC 1324, Alien Smuggling. Patricia REYES-Rios and Brayan CARACOZA-Estala will be held as a Material Witness.



James O. Jewell  
Border Patrol Agent

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P.4.1, and probable cause found on this day August 10, 2019



Jason B. Libby  
United States Magistrate Judge